
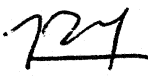


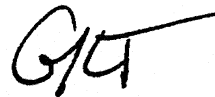
QUICK REFERENCE FOR STATUS OF ENVIRONMENTAL INDICATORS					
Name and EPA I.D. Number	Location (City or Town)	Current CA725 Decision	Current CA750 Decision	If Current Decision is Negative, Projected Date for Positive EI	
				CA725	CA750
Phibro-Tech, Inc. SCD 070 371 885	Sumter, South Carolina	YE	YE		

DATE: July 29, 2004

SUBJ: Evaluation of Phibro-Tech, Inc.'s status under the RCRIS Corrective Action
Environmental Indicator Event Codes (CA750)
EPA I.D. Number: SCD 070 371 885

FROM: Marianna DePratter, P.G. 
RCRA Hydrogeology I
Division of Hydrogeology
Bureau of Land and Waste Management

THRU: Jack Gelting, P.G., Manager 
RCRA Hydrogeology I
Division of Hydrogeology
Bureau of Land and Waste Management

TO: G. Kendall Taylor, P.G., Director 
Division of Hydrogeology
Bureau of Land and Waste Management

Narinder Kumar, Branch Chief
RCRA Program Branch
Waste Management Division
U.S. EPA Region IV

I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of Phibro-Tech Inc.'s status in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Information System (RCRIS):

1) Migration of Contaminated Groundwater Under Control (CA750),

Concurrence by the Bureau of Land and Waste Management Division of Hydrogeology's Director is required prior to changing this event code in RCRA Info. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing at the appropriate location within Attachment 1.

II. HISTORY OF ENVIRONMENTAL INDICATOR EVALUATIONS AT THE FACILITY AND REFERENCE DOCUMENTS

This particular evaluation is the third evaluation for Phibro-Tech, Inc. The initial Environmental Indicator Evaluation was completed July 22, 1998. Data reported within Phibro-Tech, Inc.'s Interim Report dated June 11, 1997 and the First Quarter 1998 RCRA Report of Groundwater Quality dated April 30, 1998 confirmed the presence of soil and groundwater contamination above health-based concentrations at the site. Because of the potential for human exposure to wastes disposed near the ground surface at the Ferrous Sulfate Burial Area (SWMU 29), a status code of CA 725 NO was recommended for Phibro-Tech, Inc. at that time. Waste and contaminated subsoils were removed from the Ferrous Sulfate Burial Area (SWMU 29) in 1999.

Subsequent to the completion of the first Environmental Indicator Evaluation, Phibro-Tech, Inc. identified debris piles as solid waste management units. The debris piles contained characteristically hazardous wastes, as well as soils and construction rubble. During the second Environmental Indicator Evaluation, conducted September 7, 2001, potential exposure to the waste within the debris piles was not considered a problem because of access restrictions at the site. Therefore, a status score of CA 725 YE, Current exposures under control, was assigned. Hazardous wastes were removed from the debris piles in August and October 2003.

III. FACILITY SUMMARY

Phibro-Tech, Inc. manufactures inorganic chemicals from raw materials and spent etchants received from offsite facilities. As of August 1995, the production of copper-based salts made up approximately 94% of the facility's total production and 100% of the hazardous waste recycling activities onsite. Other products include nickel and cobalt salts and oxides, patented and proprietary alkaline etchants, metal sulfates (such as copper and nickel sulfate) and metal nitrates. Phibro-Tech, Inc. was issued a RCRA Hazardous Waste Permit in December 1993 for the storage of hazardous wastes in containers and tanks, and for postclosure care of three former process wastewater treatment impoundments. Routine groundwater monitoring of a groundwater contaminant plume emanating from the closed impoundments is required by the permit.

Prior to 1976, Exide Battery owned and operated the facility and produced nickel flake, nickel sulphamate, and nickel sulphate. After the discovery, in 1973, of a groundwater contaminant plume underlying the process area of the site, Exide Battery modified plant operations to produce zinc chloride solutions and sodium hydroxide. Exide Battery also installed one groundwater

extraction well, called "the salvage well" in the process area of the site. The salvage well has only operated intermittently. Its effectiveness when operating has been unknown. Its construction has also been unknown.

Phibro-Tech, Inc. replaced the "salvage well" in early 2004. A pumping test of the new recovery well was conducted in April 2004. The recent pumping test failed to demonstrate effective capture of the groundwater contaminant plume emanating from the process area of the site. Consequently, Phibro-Tech, Inc. has increased its groundwater extraction rate, and plans to repeat the pumping test.

III. CONCLUSION FOR CA 750

Using direct push technology during the Phase II and Phase III RCRA Facility Investigations, Phibro-Tech, Inc. delineated the "offsite extent of the groundwater contaminant plume emanating from the process area of the site (Figure 1). In 2003, Phibro-Tech, Inc. installed three permanent monitoring wells (MW-17, MW-18, MW-19) downgradient of the process area and along the border of the former W.C. Jones Trailer Park property. These new wells were sampled on an accelerated schedule in order to obtain sufficient data to evaluate plume stability in this area of the site. Based on this recent water quality data graphed as Figures 2, 3, and 4, the groundwater contaminant plume emanating from the process area of the site appears to be stable.

The contaminant plume associated with Phibro-Tech, Inc.'s closed wastewater treatment impoundments is characterized by lower concentrations of dissolved metals in groundwater. The concentration of metal contaminants have generally decreased since the 1993 closure and capping of the impoundments (Figure 5). The one exception to these decreasing contaminant concentration trends is downgradient of the Ferrous Sulfate Burial Area (SWMU 29). Chromium and arsenic concentrations in MW-6, located downgradient of SWMU 29, have increased since 1999 (Figure 6). In the Summer of 1999, Phibro-Tech, Inc. removed waste and contaminated soil from SWMU 29. The increased chromium and arsenic concentrations detected in groundwater from MW-6 are interpreted to be short-term impacts due to increased infiltration into the previously open excavations. Given the presence of a stable groundwater contaminant plume in the process area, and a collapsing groundwater contaminant plume in the area of the closed wastewater treatment impoundments, migration of contaminated groundwater is controlled. A Migration of Contaminated Groundwater Under Control (CA 750 YE) Status Code will be assigned to Phibro-Tech, Inc. pursuant to this evaluation.

IV. SUMMARY OF FOLLOW-UP ACTIONS

The Department will continue to monitor groundwater quality in the process area and closed wastewater impoundment areas. Groundwater quality at the MW-6 location will also be monitored to see if the arsenic and chromium concentrations peak and begin to decline as expected. The process area groundwater monitoring wells (MW-17, MW-18, and MW-19) will

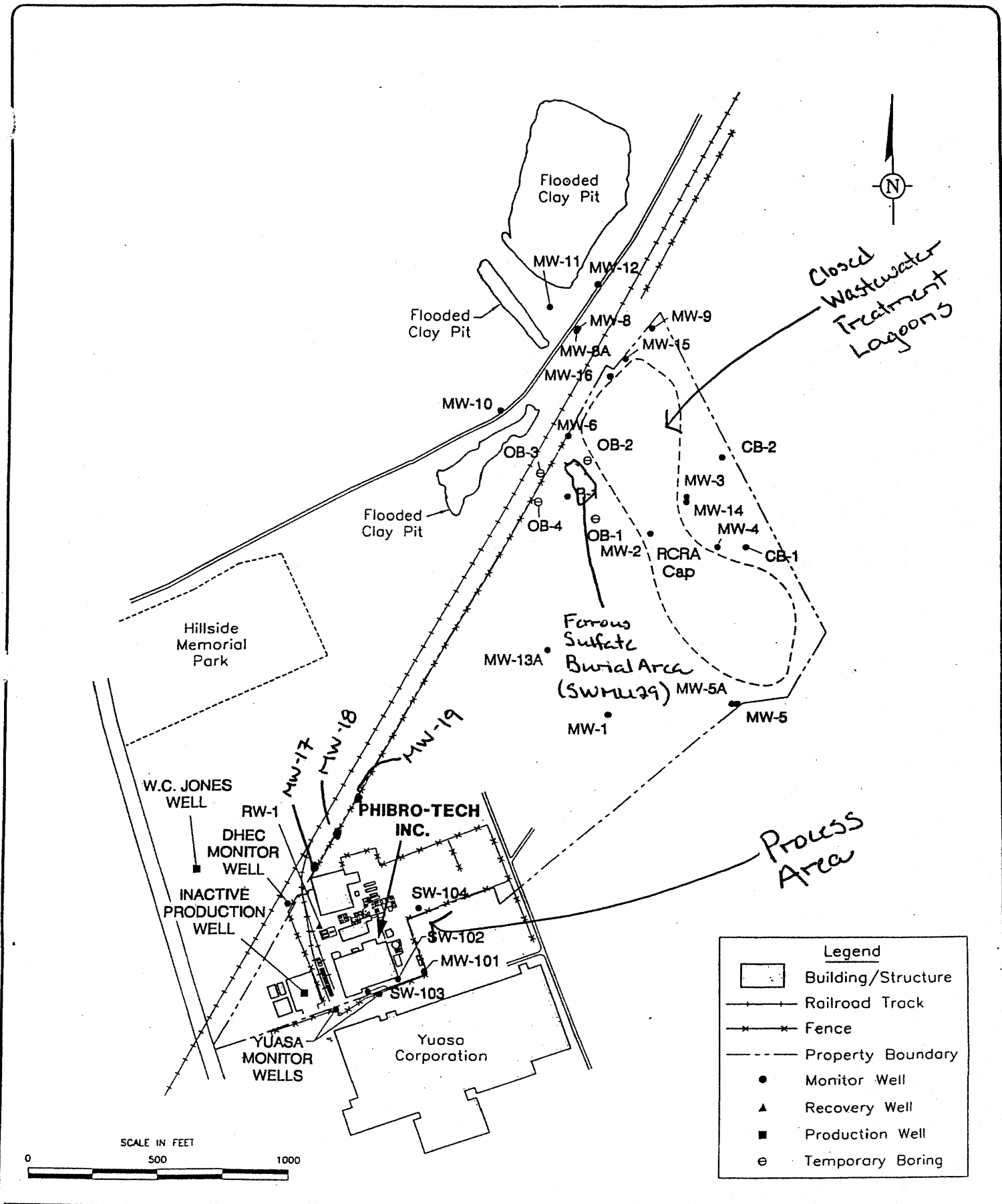


Figure 1

MW-17 Metals

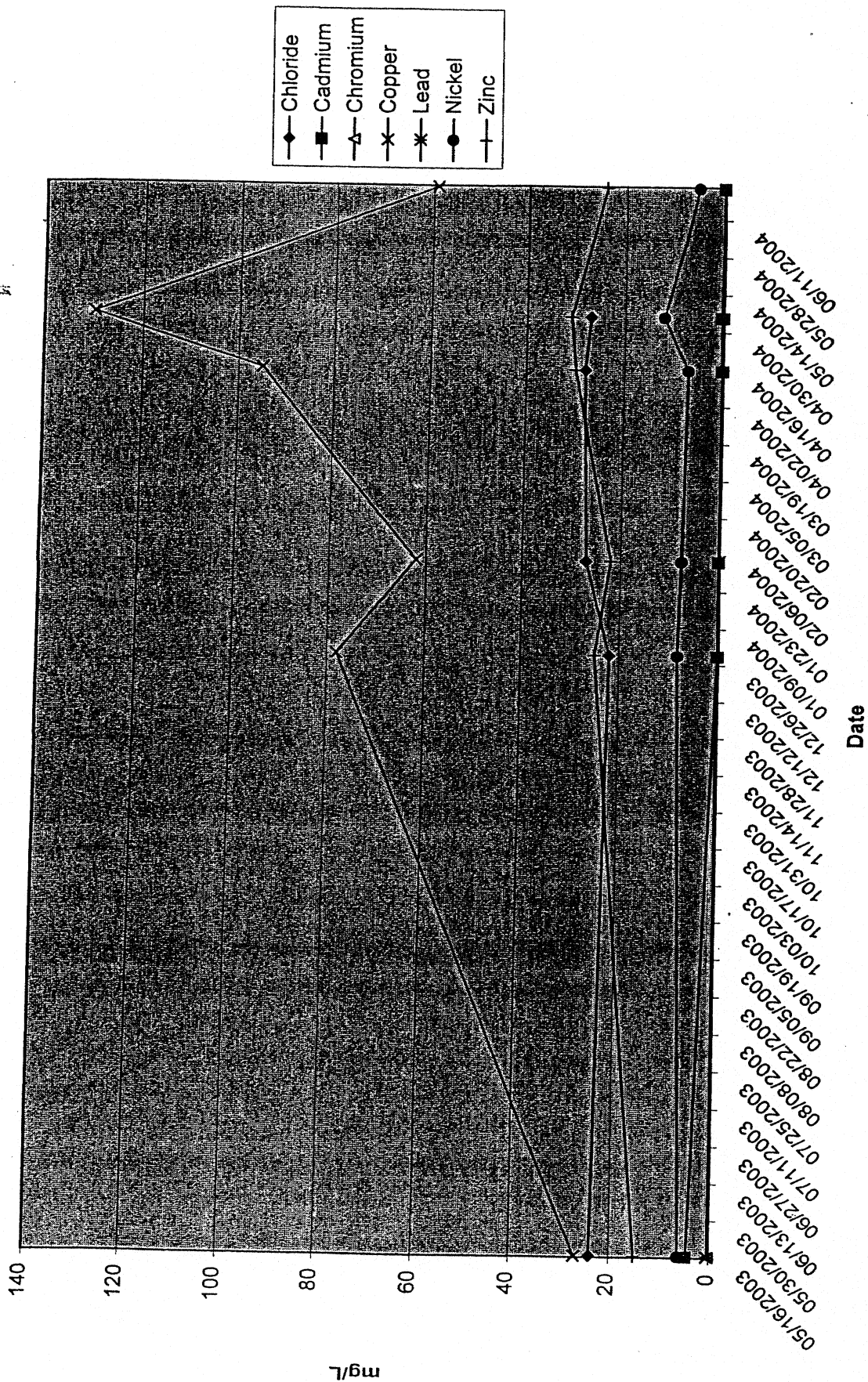


Figure 2

MW18 Metals

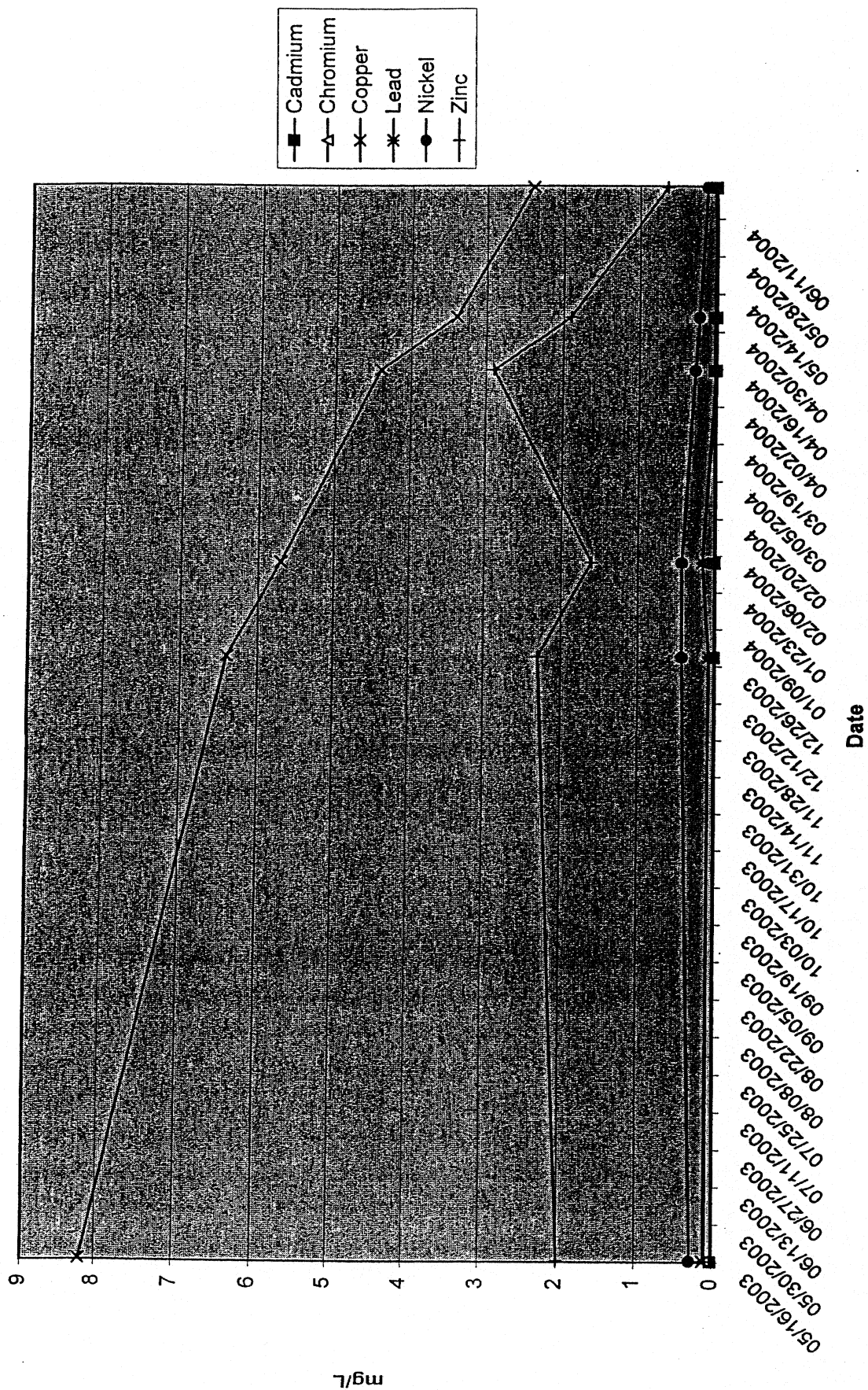


Figure 3

MW19 Metals

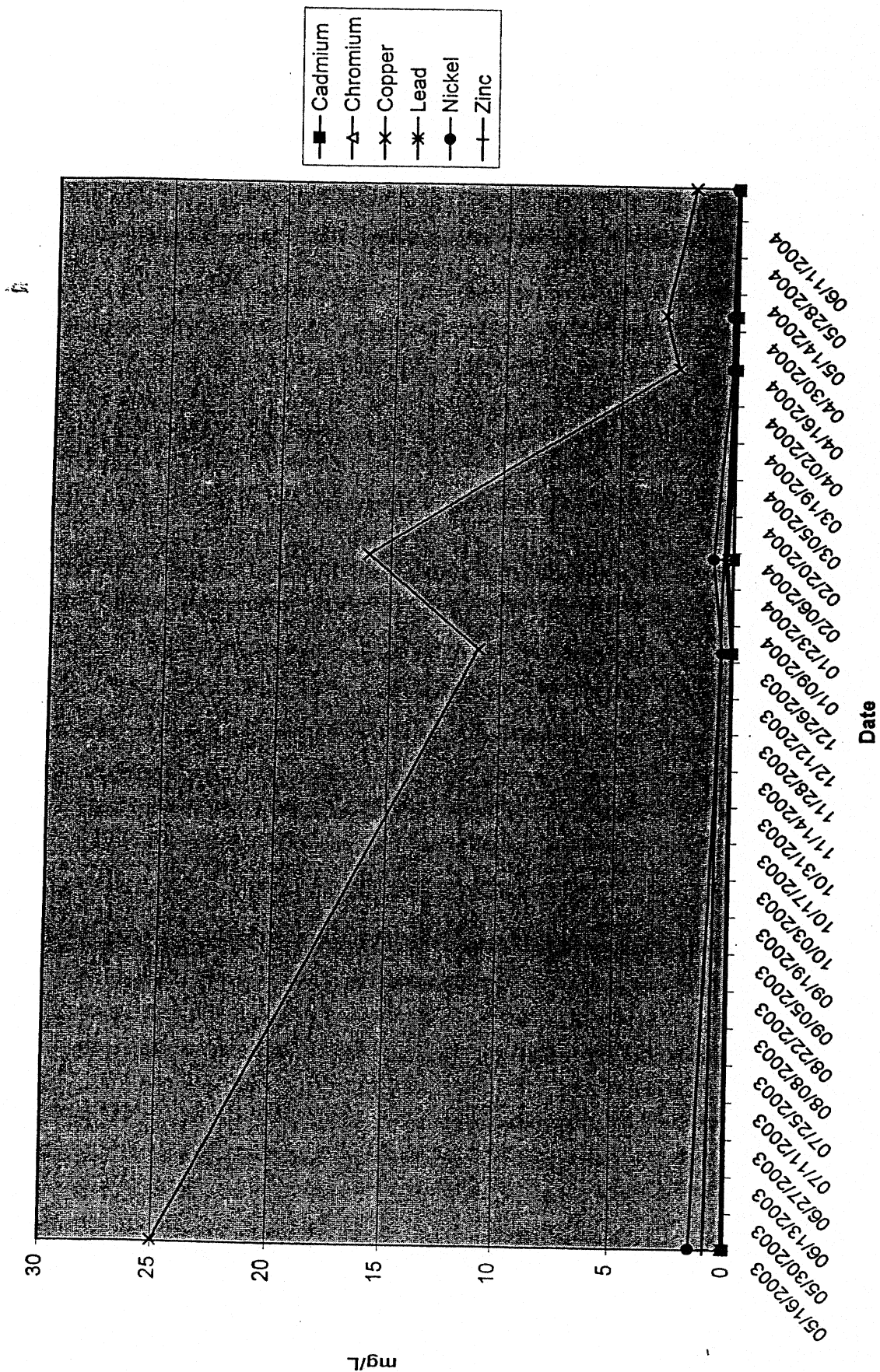


Figure 4

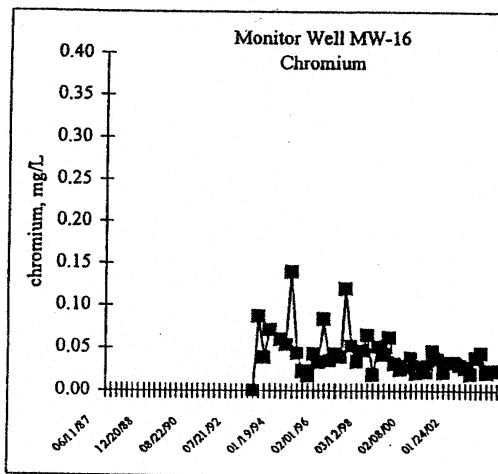
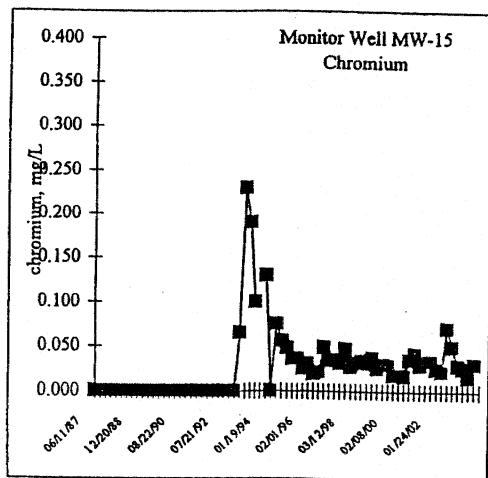
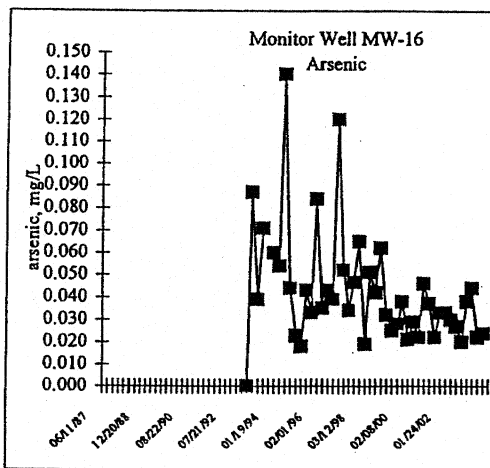
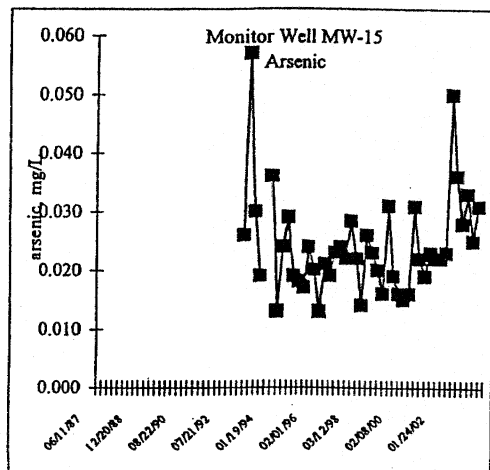
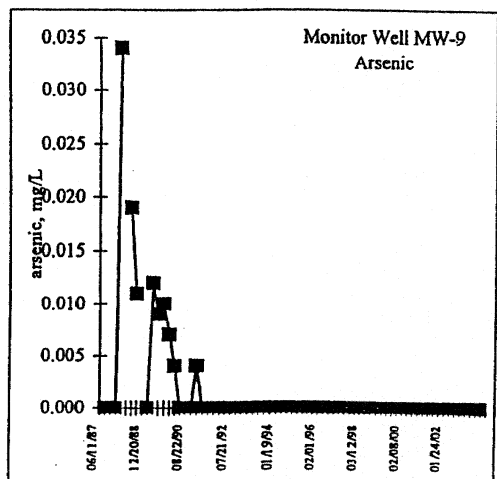


Figure 5

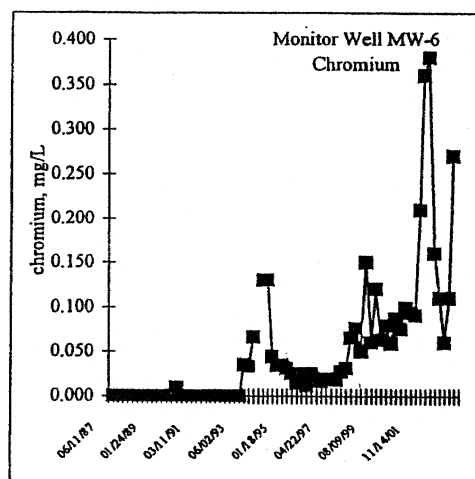
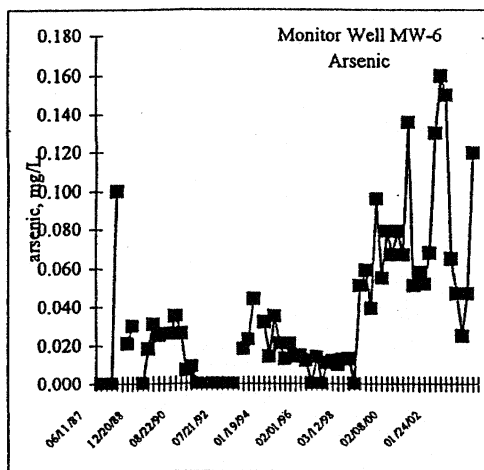


Figure 6

be incorporated into Phibro-Tech, Inc.'s post-closure care program for the closed wastewater impoundments, ensuring the availability of future groundwater quality data to verify plume stability in this area of the site. Furthermore, Phibro-Tech, Inc. will repeat the pumping test at recovery well RW-1, to evaluate capture of the groundwater contaminant plume emanating from the process area of the site.

cc: Bill Corder, Operations Engineering Section, BLWM
Chris McCluskey, Hazardous Waste Consultant, Wateree District EQC Office
Channing Bennett, US EPA Region IV

ATTACHMENT 1
DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: Phibro-Tech, Inc.
Facility Address: Hwy 15 South, Industrial Park POB 1979, Sumter, SC 29151
Facility EPA ID #: SCD 070 371 885

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below,
 If no - re-evaluate existing data, or
 If data are not available, skip to #8 and enter AIN≡ (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive Migration of Contaminated Groundwater Under Control EI determination (AYE status code) indicates that the migration of contaminated groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original area of contaminated groundwater (for all groundwater contamination subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The Migration of Contaminated Groundwater Under Control EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

2. Is **groundwater** known or reasonably suspected to be **contaminated**¹ above appropriately protective levels (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- X If yes - continue after identifying key contaminants, citing appropriate levels, and referencing supporting documentation.
- If no - skip to #8 and enter YE status code, after citing appropriate levels, and referencing supporting documentation to demonstrate that groundwater is not contaminated.
- If unknown - skip to #8 and enter IN status code.

Rationale:

Prior to February 1986, process wastewater was treated in three surface impoundments located in the northeastern corner of the property. Sludge from all three impoundments failed toxicity testing for cadmium and, consequently, were closed pursuant to RCRA. Groundwater contamination was confirmed in this area of the site prior to issuance of the initial permit for post-closure care, effective May 8, 1985. During fourth quarter of 2003, arsenic, chromium, and mercury exceeded Safe Drinking Water Act Maximum Contaminant Levels in groundwater sampled from monitoring wells that are located adjacent to, or downgradient of the closed wastewater treatment impoundments. The concentration of nickel in groundwater exceeds the Region IX US EPA Preliminary Remediation Goal for tap water (0.730 mg/l) at monitoring well MW-6.

In 1973, the site's original owner, Exide Battery, discovered a second groundwater contaminant plume underlying the main process area. The groundwater contaminant plume emanating from the process area was investigated when it was discovered that two public supply wells located downgradient of Phibro-Tech, Inc. (Exide Battery at that time) at the W.C. Jones Trailer Park had been impacted. The wells were condemned. Exide Battery bought the property, drilled a deeper domestic well, and rented the existing residence to an employee. Eventually, municipal water was provided to this residence. In 1991 Phibro-Tech, Inc. purchased the former W.C. Jones property from Exide Battery.

The two shallow water supply wells and the deeper domestic well located at the former W.C. Jones Trailer Park were sampled by the Department on a routine basis from 1973 through 1981. A well located further downgradient at the Hillside Memorial Cemetery, a well at the Cane Mill Club, and five private residences (Geddings, Leach, W.T. Russell, F.W. Russell, and Dr. Phifer) were also sampled on a routine basis during that timeframe. Based on the historical data, groundwater impact appeared to be restricted to the water table aquifer and the leading edge of the groundwater contaminant plume appeared to be within the former W.C. Jones Trailer Park property. The process area groundwater contaminant plume is characterized by

¹ Contamination and contaminated describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate levels (appropriate for the protection of the groundwater resource and its beneficial uses).

RCRA Corrective Action

Environmental Indicator (EI) RCRIS Event Code (CA750)

excessive concentrations of nickel, as well as cadmium, chromium lead, zinc, and copper. The primary source of this contaminant plume was identified in a 1974 Wilbur Smith and Associates Report to be drainage troughs (SWMU 2) within the Meaker and Nickel Hydrate Areas of the former Exide Battery Chemical Plant (i.e. now the main Phibro-Tech, Inc. Manufacturing Building).

Reference(s):

Annual 2003 Groundwater Quality Report, Phibro-Tech, Inc., dated February 27, 2004

Safe Drinking Water Act Maximum Contaminant Limits, updated May 26, 2004

Region IX US Environmental Protection Agency Preliminary Remediation Goals, updated April 28, 2004

Analytical Summary of the GPRA Wells Located at the Phibro-Tech Facility in Sumter, South Carolina, revised 6/29/07, and obtained during the July 15, 2004 Meeting at Phibro-Tech, Inc.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

3. Has the **migration** of contaminated groundwater **stabilized** such that contaminated groundwater is expected to remain within an existing area of contaminated groundwater⁷ as defined by the monitoring locations designated at the time of this determination?

 X If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the existing area of groundwater contamination⁷).

 If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the existing area of groundwater contamination²) - skip to #8 and enter NO status code, after providing an explanation.

 If unknown - skip to #8 and enter IN status code.

Rationale:

Phibro-Tech, Inc. closed the process wastewater impoundments in June 1993. Each impoundment was covered with an impervious cap to prevent rainwater infiltration and leaching. The concentrations of metals in groundwater have generally decreased since closure of the impoundments. In the Summer of 1999, Phibro-Tech, Inc. also removed waste and contaminated soil from the Ferrous Sulfate Burial Area (SWMU 29). Chromium and arsenic concentrations in downgradient well MW-6, have increased since that removal. These increases are interpreted to be short-term impacts due to increased infiltration into previously open excavations. Although the area of excavation was recontoured following waste/contaminated soil removal, topographic depressions remain that trap rainwater and promote infiltration. Future groundwater quality is expected to improve given the removal of source material.

Using direct push technology during the Phase II and Phase III RCRA Facility Investigations, Phibro-Tech, Inc. delineated the "offsite" extent of the metals plume onto the former W.C. Jones Trailer Park property. In 2003, Phibro-Tech, Inc. installed three permanent monitoring wells (MW-17, MW-18, MW-19) downgradient of the process area and along the border of the former W.C. Jones Trailer Park property. These new wells were sampled on an accelerated schedule in order to obtain sufficient data to evaluate

² An existing area of contaminated groundwater is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of contamination that can and will be sampled/tested in the future to physically verify that all contaminated groundwater remains within this area, and that the further migration of contaminated groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

plume stability in this area of the site. Based on this recent water quality data, the groundwater contaminant plume emanating from the process area of the site appears to be stable.

References:

RCRA Facility Investigation Phase 2, Phibro-Tech, Inc., dated June 28, 2000

RCRA Facility Investigation Phase 3, Phibro-Tech, Inc., dated October 31, 2001

Annual 2003 Groundwater Quality Report, Phibro-Tech, Inc., dated February 27, 2004

Analytical Summary of the GPRA Wells Located at the Phibro-Tech Facility in Sumter, South Carolina, revised 6/29/07, and obtained during the July 15, 2004 Meeting at Phibro-Tech, Inc.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

4. Does contaminated groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

X If no - skip to #7 (and enter a YE status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater contamination does not enter surface water bodies.

_____ If unknown - skip to #8 and enter IN status code.

Rationale:

Once the groundwater contaminant plume underlying the process area was discovered, surface water from Nasty Branch Creek was sampled. Nasty Branch Creek is approximately 2400 feet downgradient of Phibro-Tech, Inc. Surface water was sampled at the dam of the Cain Mill Club on Nasty Branch Creek from 1974 through 1981, on a routine basis. Nickel was rarely detected in these surface water samples at concentrations above the method detection limit of 0.1 milligrams per liter. Neither was nickel detected at concentrations above the method detection limit in groundwater samples from the cemetery or the Cain Mill Club wells, which are located between Phibro-Tech, Inc. and the surface water discharge. Nasty Branch Creek does not appear to have been impacted in the 1974 through 1981 timeframe.

Both the modification of production operations (such as the transition to zinc chloride solutions and sodium hydroxide and later to copper based salts), and the extensive paving and upgrades to secondary containment systems in the process area, appear to have effectively decreased the concentration of nickel and cadmium currently leaching from contaminated soils. Given the distance between the suspected source area and Nasty Branch Creek and the operation of a new recovery well at the suspected source area, current or future impact to surface water via the discharge of contaminated groundwater is thought to be unlikely.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

5. Is the **discharge** of contaminated groundwater into surface water likely to be **insignificant** (i.e., the maximum concentration of each contaminant discharging into surface water is less than 10 times their appropriate groundwater level, and there are no other conditions (e.g., the nature and number of discharging contaminants, or environmental setting) which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter YE status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration of key contaminants discharged above their groundwater level, the value of the appropriate level(s), and if there is evidence that the concentrations are increasing; and 2) providing a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of contaminated groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration of each contaminant discharged above its groundwater level, the value of the appropriate level(s), and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater levels, providing the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identifying if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter IN status code in #8.

Rationale:

Reference(s):

³

As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)

6. Can the **discharge** of contaminated groundwater into surface water be shown to be **currently acceptable** (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment levels, as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of contaminated groundwater can not be shown to be **currently acceptable**) - skip to #8 and enter NO status code,

⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter IN status code.

Rationale and Reference(s):

RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the existing area of contaminated groundwater?

 X If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the existing area of groundwater contamination.

 If no - enter NO status code in #8.

 If unknown - enter IN status code in #8.

Rationale and References:

Groundwater quality is currently monitored on a routine basis at the closed wastewater treatment impoundments. Monitoring is conducted pursuant to Phibro-Tech's RCRA Hazardous Waste Permit SCD 070 371 885. Routine groundwater monitoring downgradient of the process area will be incorporated into Phibro-Tech, Inc.'s postclosure care groundwater monitoring program.

**RCRA Corrective Action
Environmental Indicator (EI) RCRIS Event Code (CA750)**

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

 X YE - Yes, Migration of Contaminated Groundwater Under Control has been verified. Based on a review of the information contained in this EI determination, it has been determined that the Migration of Contaminated Groundwater is Under Control at the Phibro-Tech, Inc. site (SCD 070 371 885), located in Sumter, South Carolina. Specifically, this determination indicates that the migration of contaminated groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the existing area of contaminated groundwater. This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

 NO - Unacceptable migration of contaminated groundwater is observed or expected.

 IN - More information is needed to make a determination.

Completed by (signature) Marianna DePratter Date 7/29/04
(print) Marianna DePratter
(title) Hydrogeologist III, SCDHEC

Supervisor (signature) John Getting Date 7/29/04
(print) John Getting
(title) Program Manager
(EPA Region or State) State of SC DHEC

Locations where References may be found:

Bureau of Land and Waste Management, South Carolina Department of Health and Environmental Control, 2600 Bull Street, Columbia, South Carolina 29201

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